

**From:** Jacob Kring  
**Sent:** Wednesday, December 20, 2017 7:22 AM  
**To:** brandon@wwefirm.com  
**Subject:** Re: Delta/Cimarron

Mr. Wilson:

Please advise regarding the below. This is my third attempt to conference with you without a response.

Jacob B. Kring  
Hedrick Kring, PLLC  
214.880.9625

On Dec 19, 2017, at 1:55 PM, Jacob Kring <[Jacob@hedrickkring.com](mailto:Jacob@hedrickkring.com)> wrote:

Mr. Wilson:

Would you please kindly respond to the below e-mail. Thank you in advance.

Jacob B. Kring  
**Hedrick Kring, PLLC**  
1700 Pacific Avenue, Suite 4650 | Dallas, Texas 75201  
214.880.9625 direct | 214.206.6182 mobile | 214.481.1844 fax  
[Jacob@HedrickKring.com](mailto:Jacob@HedrickKring.com) | [www.HedrickKring.com](http://www.HedrickKring.com)

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**From:** Jacob Kring  
**Sent:** Monday, December 18, 2017 6:05 PM  
**To:** 'brandon@wwefirm.com'  
**Subject:** Delta/Cimarron

Mr. Wilson:

I am writing to you regarding your various motions and my continuing efforts to understand your pleadings. The pleading you recently filed on Friday seeking emergency relief while I was attending a funeral is devoid of material facts and any supporting authority. In my effort to understand the full-story, will you please provide me with the following:

- The amount of accounts receivable outstanding at Cimarron;
- A monthly accounts receivable report from January 1, 2016, through to the present;
- The management agreement between Cimarron and New Light;
- All communications between Cimarron and New Light regarding Delta's lawsuit against Cimarron;

- All documents showing where the revenues went that were generated by Delta's healthcare providers;
- All communications between Cimarron and New Light regarding the judgment against Cimarron;
- All documents evidence New Light's knowledge of the lawsuit or the judgment against Cimarron;
- All documents evidencing New Light's awareness of hiring Delta's healthcare provider;
- All internal communications at New Light regarding Delta's lawsuit against Cimarron or the judgment against Cimarron;
- The current bank statement of Cimarron;
- Monthly bank statements for Cimarron from January 1, 2016, through to the present;
- Monthly balance sheets for Cimarron from January 1, 2016, through to the present;
- All documents evidencing New Light's efforts to foreclose on any of Cimarron's collateral;
- All documents evidencing Cimarron's breach of the promissory note between New Light and Cimarron;
- Monthly income statements for Cimarron from January 1, 2016, through to the present.

Please advise when you may be able to produce such information. If you are not willing to produce this information please let me know.

I would also like to take the deposition of a corporate representative of New Light. Assuming you are willing to cooperate, please provide some available dates for you and New Light.

Jacob B. Kring

**Hedrick Kring, PLLC**

1700 Pacific Avenue, Suite 4650 | Dallas, Texas 75201

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